

**From:** [Smith, Peterj](#)  
**To:** [Arling, Michelle](#); [Berwald, Derek](#); [Christensen, Carol](#); [Davis, Kathy](#); [Ellenberger, Jay](#); [Evans, Elizabeth](#); [Evans, Jeff](#); [Garrison, Scott](#); [Guillaran, Yu-Ting](#); [Hofmann, Angela](#); [Huskey, Angela](#); [Keaney, Kevin](#); [Kiely, Timothy](#); [Maguire, Kelly](#); [Pont, Richard](#); [Thundiyil, Karen](#); [Wingate, Diedra](#); [Wyatt, TJ](#)  
**Subject:** SENT TO OMB: EO 12866 Review: Ag Worker Protection Standard Revisions NPRM (RIN 2070-AJ22) - Updated EA Executive Summary  
**Date:** Friday, January 17, 2014 11:22:55 AM  
**Attachments:** [RIN2070-AJ22 EO12866 AgWPS NPRM EA Revised ExecSum 2014-01-16.docx](#)  
[RIN2070-AJ22 EO12866 AgWPS NPRM EA Redline Revisions ExecSum 2014-01-16.docx](#)

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Sent moments ago. Talk to you all at 2. Thanks!!

Peter Smith  
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**From:** Smith, Peterj  
**Sent:** Friday, January 17, 2014 11:21 AM  
**To:** 'Jones, Danielle'  
**Cc:** Hofmann, Angela; Davis, Kathy; Keaney, Kevin; Garrison, Scott; Thundiyil, Karen; Wyatt, TJ  
**Subject:** EO 12866 Review: Ag Worker Protection Standard Revisions NPRM (RIN 2070-AJ22) - Updated EA Executive Summary

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## EO 12866 Review Day 85

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Hi Danielle,

Attached is the updated executive summary excerpted from the WPS EA currently under revision. We incorporated edits per our discussion last Friday, including identifying the market failure as asymmetric information, adjusting estimates to account for qualitative rather than quantitative discussion (and presentation) relative to the request on break-even. We also incorporated some fairly minor corrections to the cost estimates to account for the inclusion of livestock establishments in the scope of rule (per USDA comments during the FIFRA review), and the minimum age being 16 rather than 18. We're pretty close on the rest of the EA; as anticipated, we will indeed need to make conforming changes in the draft NPRM. Stay tuned! In the meantime, if you have any questions about these revisions, please let me know ASAP. Thanks!!

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